

To: CN=Erin Foresman/OU=R9/O=USEPA/C=US@EPA[]
Cc: CN=Bruce Herbold/OU=R9/O=USEPA/C=US@EPA;CN=Karen Schwinn/OU=R9/O=USEPA/C=US@EPA[]; N=Karen Schwinn/OU=R9/O=USEPA/C=US@EPA[]
From: CN=Carolyn Yale/OU=R9/O=USEPA/C=US
Sent: Thur 10/20/2011 9:24:47 PM
Subject: Re: Review of Appendix D -- BDCP toxins

I think we hit the button at the same time.

I've read selenium and will send that along soon. Started at the beginning and got thru general and mercury.

Used more verbiage than you but could condense (or underline in follow up).

There's a lot more known about mercury (eg) than they plug into the doc but I think the main point is to COMMIT to the responsibilities assigned under the TMDL, which is essentially supporting control and characteriz studies to develop condition/ site-specific information. I think we and they could be specific about what work needs to be done-- what the monitoring and control studies should cover.

What I found most disappointing is the very simplistic conceptual version of flow change effects (it's not just less water, change (?) in concentration, by any means-- but the routing, mixing, transport processes and how this intersects with habitat and temporal variables).

Is there anything anticipated in the way of site-specific analyses, or is this it?

Bruce should look at that Table D 1, too.

Copper? No. But I'll investigate.

C

Carolyn Yale
US EPA Watersheds Office
phone: 415-972-3482
fax: 415-947-3537
yale.carolyn@epa.gov

From: Erin Foresman/R9/USEPA/US
To: Carolyn Yale/R9/USEPA/US@EPA, Bruce Herbold/R9/USEPA/US@EPA, Karen Schwinn/R9/USEPA/US@EPA
Date: 10/20/2011 02:03 PM
Subject: Review of Appendix D -- BDCP toxins

Hi All,

I read through the toxins appendix for BDCP. My initial general thoughts on the document are bulleted below. I have questions about what kind of feedback they are looking to receive from us. This is clearly focused on ESA and impacts to T & E species. It is not CWA focused but DWR would like this EIS to support a CWA 404 permit and 401 cert. Do we give them input about what information we need in the NEPA doc for CWA decisions?

I don't understand Table D-1 and/or the information and decision rules they used to create it. Evaluation scope needs to extend beyond the legal Delta to acknowledge that many contaminants enter

the Delta from upstream watersheds.

We need to somehow check the claim that quantitative analysis is not possible.

Conclusions are drawn from very little information. Selenium is a good example "Concentrations of selenium in the Sacramento River system are considered low, with the total amount of selenium transported dependent on the volume of flow. Decreased Sacramento River flows into the Delta as a result of the preliminary proposal are expected to result in minimal effects on selenium water concentrations in teh Delta." The same type of leaps are made in all sections. No information is provided but the conclusion is that operations and restoration will have no immediate effect or will have may an short term increase in loading (e.g., methylmercury) but a long term benefit so in the end impacts are expected to be minimal.

I don't know much about copper. Is there anyone at EPA we can get to look at that section? Section D.6.2 contains DWRs conclusions about toxics on fish. Bruce could you take a quick look at that part D-38-42.

Carolyn, have you read the se section? Any other sections?

Erin Foresman

Environmental Scientist & Policy Coordinator,
US EPA Region 9 C/O Army Corps of Engineers
650 Capitol Mall Suite 5-200, Sacramento, CA 95814
Phone: (916) 557 5253, Fax: (916) 930 9506

<http://www.epa.gov/region9/water/watershed/sfbay-delta/index.html>